

# **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Asbestos Products Liability  
Litigation (No. VI)

This document relates to:

All cases included in the list attached  
as Exhibit A (CVLO-1)

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MDL No. 875

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**DEFENDANT CBS CORPORATION'S  
SCREENING AND EVALUATION INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS  
TO CVLO-1 PLAINTIFFS IDENTIFIED ON EXHIBIT A**

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Pursuant to Federal Rules of Civil Procedure 33 and 34, Defendant, CBS Corporation, a Delaware corporation, f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania corporation, f/k/a Westinghouse Electric Corporation, and hereinafter referred to as ("Westinghouse"), requests that the Plaintiffs listed in each case on the attached Exhibit A provide sworn answers to the following Interrogatories and Requests for Production of Documents within thirty (30) days.

**DEFINITIONS**

1. "Plaintiff" means the Plaintiff or Plaintiff's Decedent.
2. "Document" means all documents and records of any kind, whether printed, written, produced by hand, or recorded or reproduced by any mechanical, digital, or electronic process. This includes any marginal comments appearing on any document.
3. When used in connection with a person, "identify" means to state that person's full name, current or last known residential and business addresses, current or last known residential and business telephone numbers, current or last known job title and place of employment, and, if known, whether the person is living or deceased.
4. When used in connection with a document, "identify" means to state with respect to each such document: the nature and substance thereof, the date it bears, the date it was

prepared, the identity or identities of the author or authors thereof, the identity of each addressee, the identity or identities of the present custodian or custodians thereof, and the present location of the document.

### INSTRUCTIONS

1. If you know of any document, communication, or information but cannot give the specific information or the full information the interrogatory or request for production calls for, provide the best information you have on the subject and identify each and every person you believe to have the requested information.
2. These requests seek answers based on all information available to you, however it was obtained, and any and all information in your actual or constructive possession or knowledge, or in the actual or constructive possession or knowledge of your attorneys, agents or representatives.
3. If you claim that your answer to an interrogatory (or a part thereof) or a response to a request for the production of documents (or a part thereof) is privileged or otherwise protected from discovery, identify the information or documents by subject matter and state with particularity the nature and basis of your claim.
4. If you object to any part of an interrogatory or request for production of documents, state the basis of your objection and also respond to all parts to which you do not object.

### INTERROGATORIES

1. Identify all doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities involved in screenings or medical evaluations of Plaintiff for an asbestos-related disease, and the services performed by each such person or entity.
2. Identify all documents used or generated by each of the doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities identified in response to Interrogatory No. 1 in connection with the screenings or medical evaluations of Plaintiff and all other persons represented by the Cascino Vaughan Law Offices for asbestos-related disease, including but not limited to patient or client lists; billing and payment records; x-ray interpretation reports (including B read reports); medical, exposure, and occupational histories; pulmonary function test reports; reports of physical examinations; and reports of diagnoses.

### REQUEST FOR PRODUCTION OF DOCUMENTS

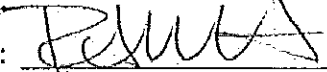
1. Produce all documents used or generated by each of the doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities identified in response to Interrogatory No. 1 in connection with the screenings or medical evaluations of Plaintiff and all other persons represented by the

Cascino Vaughan Law Offices for asbestos-related disease, including but not limited to patient or client lists; billing and payment records; x-ray interpretation reports (including B read reports); medical, exposure, and occupational histories; pulmonary function test reports; reports of physical examinations; and reports of diagnoses.

This the 31<sup>st</sup> day of August, 2011.

Respectively submitted,

EVERT WEATHERSBY HOUFF

By: 

Richard M. Lauth

Attorney for CBS Corporation, a Delaware Corporation, f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania Corporation, f/k/a Westinghouse Electric Corporation

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**CERTIFICATE OF SERVICE**

I, Richard M. Lauth, do hereby certify that I have this 31<sup>st</sup> day of August, 2011, served a true copy and correct copy of the Screening and Evaluation Interrogatories and Request for Production of Documents to CVLO-1 Plaintiffs identified on Exhibit A of CBS Corporation, a Delaware corporation, f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania corporation, f/k/a Westinghouse Electric Corporation to Counsel for Plaintiffs via electronic mail and U.S. Mail and have advised all counsel for Defendants of the filing of same.

Respectively submitted,

EVERT WEATHERSBY HOUFF

By: 

Richard M. Lauth  
Attorney for CBS Corporation, a Delaware  
Corporation, f/k/a Viacom Inc., successor  
by merger to CBS Corporation, a Pennsylvania  
Corporation, f/k/a Westinghouse Electric  
Corporation

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## EXHIBIT A (CVLO-1)

ABERLE, GLENN	E.Dist.PA. Case No. 08-CV-91650
ALSENE, DELMAR	E.Dist.PA. Case No. 08-CV-92187
ANUSZKIEWICZ, ROMAN R	E.Dist.PA. Case No. 08-CV-90938
AYERS, MARK H	E.Dist.PA. Case No. 08-CV-91953
BARK, JAMES A	E.Dist.PA. Case No. 10-CV-64542
BARNETT, ROSCOE	E.Dist.PA. Case No. 10-CV-68919
BAULT, CHARLES	E.Dist.PA. Case No. 08-CV-91663
BEACH, LAUNDY E JR	E.Dist.PA. Case No. 10-CV-68142
BEDDOW, MERLE J	E.Dist.PA. Case No. 08-CV-92239
BEENEY, DONALD G SR	E.Dist.PA. Case No. 08-CV-91728
BELL, ORVILLE L	E.Dist.PA. Case No. 08-CV-92260
BEMENT, JAMES R	E.Dist.PA. Case No. 10-CV-67615
BENNETT, CLIFFORD J	E.Dist.PA. Case No. 08-CV-90082
BENNETT, JACK L	E.Dist.PA. Case No. 10-CV-68968
BLACK, JOHN A JR	E.Dist.PA. Case No. 10-CV-68110
BODINE, RICHARD L	E.Dist.PA. Case No. 08-CV-92055
BROOKS, RAY	E.Dist.PA. Case No. 08-CV-92194
BROWNLEE, THEODORE	E.Dist.PA. Case No. 08-CV-91954
BUCHANAN, MICHAEL E	E.Dist.PA. Case No. 10-CV-68074
BUGG, WILLIAM J SR	E.Dist.PA. Case No. 08-CV-91729
BURTON, ALICE M	E.Dist.PA. Case No. 08-CV-92139
BURTON, WILLIAM E	E.Dist.PA. Case No. 08-CV-92309
CASTROS, AROL L	E.Dist.PA. Case No. 08-CV-91760
CENTERS, ALBERT	E.Dist.PA. Case No. 08-CV-90268
CHAVEZ, RICHARD	E.Dist.PA. Case No. 08-CV-90342
COHEN, RONALD	E.Dist.PA. Case No. 09-CV-64755
COX, CHARLES	E.Dist.PA. Case No. 08-CV-91866
COX, DONALD E SR	E.Dist.PA. Case No. 08-CV-92244
CRADDOCK, JOHN	E.Dist.PA. Case No. 10-CV-68114
CRAIN, PAUL D	E.Dist.PA. Case No. 08-CV-89841
CRAVEN, JOHN E	E.Dist.PA. Case No. 10-CV-67678
CRIFE, GEORGE	E.Dist.PA. Case No. 08-CV-91940
CUMMINGS, RONALD L	E.Dist.PA. Case No. 10-CV-68902
DALTON, JACK L	E.Dist.PA. Case No. 08-CV-91944
DARLING, WILLIAM O	E.Dist.PA. Case No. 08-CV-92236
DAVIS, EDGAR L	E.Dist.PA. Case No. 08-CV-92201
DEAVILLE, KENNETH R JR	E.Dist.PA. Case No. 08-CV-92064
DELKS, CAROL L	E.Dist.PA. Case No. 08-CV-88681
DETERS, CLETUS J	E.Dist.PA. Case No. 10-CV-64585
DOVER, JACKIE W	E.Dist.PA. Case No. 10-CV-68127
DUAL, MONTE L SR	E.Dist.PA. Case No. 08-CV-92314
DUBOIS, CHARLES E	E.Dist.PA. Case No. 08-CV-92119
EBERT, MICHAEL G	E.Dist.PA. Case No. 08-CV-89432
EDBROOKE, RICHARD C	E.Dist.PA. Case No. 08-CV-92254
EDWARDS, TERRY A	E.Dist.PA. Case No. 08-CV-92137
ENDSLEY, ROBERT L	E.Dist.PA. Case No. 08-CV-92025
ESTOCK, ROBERT S	E.Dist.PA. Case No. 08-CV-92026
FIELDS, WILLIAM W	E.Dist.PA. Case No. 10-CV-68082
FISHER, PASCAL J	E.Dist.PA. Case No. 08-CV-92173

FONNER, LARRY W SR	E.Dist.PA. Case No. 08-CV-92222
FRABONI, LOUIS	E.Dist.PA. Case No. 08-CV-91671
FRAMPTON, KENNETH E	E.Dist.PA. Case No. 08-CV-92160
GABBARD, BEN	E.Dist.PA. Case No. 08-CV-92151
GABBARD, ROBERT W	E.Dist.PA. Case No. 08-CV-92145
GARD, LESLIE E	E.Dist.PA. Case No. 08-CV-91736
GARECHT, ROBERT	E.Dist.PA. Case No. 08-CV-92134
GEIGER, GERALD E	E.Dist.PA. Case No. 08-CV-91676
GIULIANO, WILLIAM J	E.Dist.PA. Case No. 09-CV-64609
GOETSCH, RANDALL P.	E.Dist.PA. Case No. 08-CV-91673
GRAVES, WILLIAM R SR	E.Dist.PA. Case No. 08-CV-92120
GREEN, ROBERT	E.Dist.PA. Case No. 08-CV-92311
GRIER, DAVID L.	E.Dist.PA. Case No. 08-CV-91657
GRIER, JOHN C.	E.Dist.PA. Case No. 08-CV-91687
HAMANN, KENNETH	E.Dist.PA. Case No. 08-CV-92181
HARRISON, HOLLIS	E.Dist.PA. Case No. 08-CV-92141
HART, ANDREW G	E.Dist.PA. Case No. 08-CV-91674
HATFIELD, BOBBY	E.Dist.PA. Case No. 08-CV-92147
HELFERS, CARL F	E.Dist.PA. Case No. 08-CV-92196
HELTON, BURL F	E.Dist.PA. Case No. 09-CV-61719
HENNEY, JEAN S	E.Dist.PA. Case No. 09-CV-64629
HESS, ROY	E.Dist.PA. Case No. 08-CV-92180
HILL, JOHN E	E.Dist.PA. Case No. 10-CV-64557
HOCKINGS, DANIEL J	E.Dist.PA. Case No. 08-CV-89796
HOLDEN, MICHAEL H	E.Dist.PA. Case No. 08-CV-92154
HORN, RICHARD G	E.Dist.PA. Case No. 10-CV-68096
HOSKINS, ADAM E	E.Dist.PA. Case No. 08-CV-89474
HUBERT, WILLIAM G	E.Dist.PA. Case No. 08-CV-92068
HULMES, DARRELL D	E.Dist.PA. Case No. 08-CV-92135
HUTCHINSON, JACK	E.Dist.PA. Case No. 08-CV-92157
HYLAND, GERALD A	E.Dist.PA. Case No. 08-CV-91862
IRONS, GARY L	E.Dist.PA. Case No. 10-CV-68130
JACKSON, WILLIAM	E.Dist.PA. Case No. 08-CV-92189
JANKO, ALBERT	E.Dist.PA. Case No. 09-CV-91675
JENNINGS, BILLY G	E.Dist.PA. Case No. 08-CV-91757
JINDRESEK, WALTER A	E.Dist.PA. Case No. 08-CV-91858
JOHNSON, DOROTHY E	E.Dist.PA. Case No. 08-CV-91691
JOHNSON, LEO M	E.Dist.PA. Case No. 08-CV-91661
JOHNSON, RICHARD G	E.Dist.PA. Case No. 08-CV-92122
KELLY, ROBERT H	E.Dist.PA. Case No. 08-CV-91696
KENNEDY, ROY L	E.Dist.PA. Case No. 08-CV-89492
KNAPP, JIMMY D	E.Dist.PA. Case No. 08-CV-91763
KRUSE, PATRICK B	E.Dist.PA. Case No. 08-CV-91867
LAHOOD, HARRY M	E.Dist.PA. Case No. 10-CV-68131
LAWLESS, ANTHONY R	E.Dist.PA. Case No. 08-CV-92161
LOWER, GARRY W	E.Dist.PA. Case No. 10-CV-68129
MARCOGLIESE, FRANK JR	E.Dist.PA. Case No. 08-CV-89497
MARESCA, JOSEPH C SR	E.Dist.PA. Case No. 08-CV-90328
MARTIN, DAVID B	E.Dist.PA. Case No. 10-CV-61109
MATHENEY, ROY	E.Dist.PA. Case No. 08-CV-91955
MAY, DALE L	E.Dist.PA. Case No. 08-CV-92116
MCMAHILL, CLAIR D	E.Dist.PA. Case No. 10-CV-68126
MEISCHNER, GISELA	E.Dist.PA. Case No. 08-CV-92192



MEISCHNER, LEONARD C	E.Dist.PA. Case No. 08-CV-91758
MILLARD, EUGENE H	E.Dist.PA. Case No. 10-CV-68119
MOORE, GEORGE E	E.Dist.PA. Case No. 08-CV-91869
MORR, LEE	E.Dist.PA. Case No. 08-CV-92152
MORRIS, DAVID E SR	E.Dist.PA. Case No. 08-CV-92162
MORTHOLE, EDWARD J	E.Dist.PA. Case No. 08-CV-91868
MORTON, KENNETH E	E.Dist.PA. Case No. 08-CV-92253
NALL, CLYDE	E.Dist.PA. Case No. 08-CV-90084
NELMS, KENNETH	E.Dist.PA. Case No. 08-CV-91666
NICHOLS, GERALD J	E.Dist.PA. Case No. 10-CV-68097
NICHOLS, LEONARD R	E.Dist.PA. Case No. 10-CV-68105
O'BOYLE, DARRELL T	E.Dist.PA. Case No. 10-CV-68087
O'KEEFE, ROBERT	E.Dist.PA. Case No. 08-CV-92210
PALSGROVE, JOSEPH H	E.Dist.PA. Case No. 08-CV-99373
PETERSON, ROBERT E	E.Dist.PA. Case No. 08-CV-92040
PETERSON, WILLIAM	E.Dist.PA. Case No. 08-CV-92224
PHARES, MILLARD C	E.Dist.PA. Case No. 10-CV-68866
PHIPPS, PAUL	E.Dist.PA. Case No. 08-CV-92220
PIERCE, JAMES T JR	E.Dist.PA. Case No. 10-CV-68094
PITTMAN, FRANK J	E.Dist.PA. Case No. 08-CV-89441
PLUE, RICHARD L	E.Dist.PA. Case No. 10-CV-68073
POE, RICHARD E	E.Dist.PA. Case No. 10-CV-68107
POTTS, STANLEY C	E.Dist.PA. Case No. 08-CV-91872
POWELL, DALE C	E.Dist.PA. Case No. 08-CV-82923
POWELL, JOHN R	E.Dist.PA. Case No. 08-CV-92012
POWELL, THOMAS J	E.Dist.PA. Case No. 08-CV-91885
RASNER, DONALD	E.Dist.PA. Case No. 08-CV-92143
REED, ODELL SR	E.Dist.PA. Case No. 10-CV-61353
REINHARDT, GARY L	E.Dist.PA. Case No. 08-CV-92131
REINOEHL, DONALD D	E.Dist.PA. Case No. 08-CV-89460
RIGGS, IRVING L	E.Dist.PA. Case No. 08-CV-91762
ROGERS, JOHN R	E.Dist.PA. Case No. 08-CV-92167
SAMS, PHILLIP	E.Dist.PA. Case No. 08-CV-88575
SEIFERT, WILLIAM J	E.Dist.PA. Case No. 08-CV-92171
SHORT, JOHNNIE D	E.Dist.PA. Case No. 08-CV-92164
SMITH, ORVILLE R	E.Dist.PA. Case No. 10-CV-68104
SMITH, RONALD	E.Dist.PA. Case No. 08-CV-90287
SPANGLER, HERBERT E	E.Dist.PA. Case No. 08-CV-91882
SPRAGUE, BILLY L	E.Dist.PA. Case No. 08-CV-90112
SNYDER, AMESES	E.Dist.PA. Case No. 08-CV-92225
TAYLOR, JAMES E	E.Dist.PA. Case No. 08-CV-91881
THOMAS, GLENDEL W	E.Dist.PA. Case No. 08-CV-92206
THURMAN, ERNEST	E.Dist.PA. Case No. 08-CV-92188
TONARELLI, RUSSELL J	E.Dist.PA. Case No. 08-CV-91665
TOVEY, ROBERT D	E.Dist.PA. Case No. 08-CV-92133
WALKER, CLARENCE L JR	E.Dist.PA. Case No. 08-CV-92136
WALLMAN, RJ	E.Dist.PA. Case No. 08-CV-88587
WARE, WILLIAM T	E.Dist.PA. Case No. 08-CV-92159
WATERSTRADT, HENRY J SR	E.Dist.PA. Case No. 08-CV-92045
WESLEY, KEITH P	E.Dist.PA. Case No. 10-CV-64570
WHITE, DONALD W	E.Dist.PA. Case No. 08-CV-92036
WILLIAMSON, RICHARD L	E.Dist.PA. Case No. 08-CV-91878
WILSON, MERLE D	E.Dist.PA. Case No. 08-CV-91879



WINDERS, BERLIE W	E.Dist.PA. Case No. 08-CV-92061
WITTMAYER, AUSTIN J	E.Dist.PA. Case No. 08-CV-91739
WORKMAN, JOHN V	E.Dist.PA. Case No. 10-CV-68071
SCHURTZ, MICHAEL R	E.Dist.PA. Case No. 08-CV-91742
TURNER, LARRY G	E.Dist.PA. Case No. 08-CV-89903
UNZICKER, LEONARD	E.Dist.PA. Case No. 11-CV-66288
WIKER, PHILLIP E	E.Dist.PA. Case No. 08-CV-92207
WRIGHT, RANDALL	E.Dist.PA. Case No. 08-CV-89966